

Comments received by mail

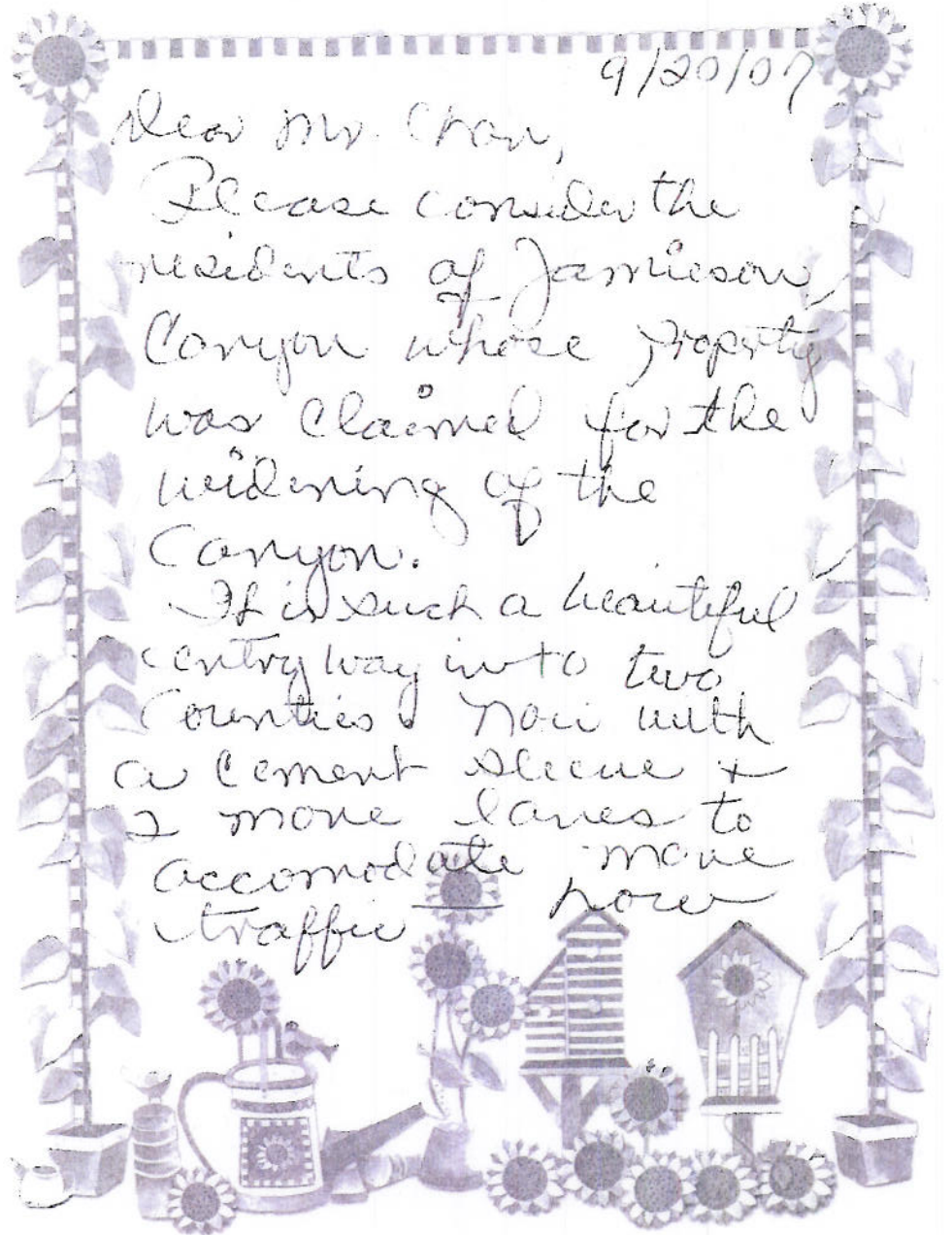
LA1

9/20/07

Dear Mr. Chan,

Please consider the residents of Jamieson Canyon whose property was claimed for the widening of the Canyon.

It is such a beautiful country way into two Counties. Now with a cement sleeve & 2 more lanes to accomodate more traffic now



L A Z

ugly can that be?

Why not make the
Canyon one way during
high traffic times
and reverse it in the
evenings? Was this
ever considered?

Thank you for listening.

Sincerely

Rais Capp *Ruffin Grossman*
2201 Mt. Veeder Rd.
Napa, CA 94558



BAY AREA
RIDGE TRAIL
COUNCIL

September 21, 2007

Mr. Howell Chan, Senior Environmental Planner
P.O. Box 23660, Mail Station 6-C
Oakland, CA 94623-0660

RE: Highway 12 Jameson Canyon Road IS/EA/Proposed MND dated August 2007

Dear Mr. Chan,

Thank you for the opportunity to comment on the Highway 12 Jameson Canyon Road IS/EA/Proposed MND (IS/ES) dated August 2007. The Bay Area Ridge Trail Council is a 501(c)(3) non-profit organization. Our mission is to complete the Bay Area Ridge Trail (Ridge Trail), a public multi-use trail route on the ridgelines surrounding the San Francisco Bay. As planned, the 550+ mile Ridge Trail will connect public open spaces and parklands in the nine Bay Area counties, providing spectacular ridgeline vistas. As of June 2007, 305 miles of dedicated Ridge Trail are dedicated and permanently protected for hikers, equestrians, mountain bicyclists, trail runners, and outdoors enthusiasts of all ages.

The Ridge Trail is dedicated in the following parks in the project's vicinity and will ultimately connect them – Lynch Canyon Open Space Preserve in Solano County and Skyline Park Regional Park and Kennedy Park in Napa County. Kennedy Park is a location where the San Francisco Bay Trail (Bay Trail) and Ridge Trail intersect. The Ridge Trail will eventually serve American Canyon residents in the Newell Open Space Preserve and ultimately connect all 4 public open space and parklands.

The Ridge Trail's primary planned alignment in the project area crosses Highway 12 close to the boundary between Solano and Napa Counties. There is also an adopted Ridge Trail connector trail alignment paralleling Highway 12 in the project area.

BART 1
The IS/EA has no references to several planned bike paths and regional trail facilities. Highway 12/Jameson Canyon path is identified in the Solano County Comprehensive Transportation Plan (Solano County TP) as a Class I facility, and in the draft Napa County General Plan (Napa GP) as a Class II facility. Additionally, the Napa GP calls for the installation of a Ridge Trail crossing of Highway 12 for pedestrian, equestrian and bicycle use. ABAG has adopted the San Francisco Bay Trail Plan and the planned Bay Area Ridge

Trail alignment referenced above is within the project area. While the IS/EA does reference the Napa County General Plan and its call for a Class II bike lane, it does not adequately discuss how the proposed project will implement this bike lane or the public facilities referenced in the other plans above.

BART 2

Both the Ridge Trail and the Bay Trail accommodate bicyclists and pedestrians and the Ridge Trail also accommodates equestrians. Both regional trail organizations work closely together to ensure connections between them wherever possible and their alignments are both coterminous and intersect in the project area. Please provide information regarding how the Caltrans policy -- requiring that bicycling and walking be considered when new or expanded facilities are proposed -- is applied in this project's plans, including ADA compliance.

BART 3

We request a response regarding how all of these important and planned public facilities will be addressed and included in the proposed project. Construction of the bikepaths in both directions and an undercrossing should be incorporated into the project and funded for construction as soon as possible. Consider the importance of a Class I pathway in providing safe, non-motorized transportation as well as an undercrossing near the mid point of Jameson Canyon for the safety of motorists, bicyclists and other path users in emergency situations.

Thank you again for the opportunity to comment on the Highway 12 Jameson Canyon Road IS/EA/Proposed MND. If you have any questions please contact me at (707) 823-3236, or by e-mail at ridgetrailnorth@comcast.net.

Sincerely,

Dee Swanhuysen
North Bay Trail Director
1800 Jonive Road
Sebastopol, CA 95472

Cc: Janet McBride, ED
Bay Area Ridge Trail Council

September 22, 2007

Caltrans Office of Environmental Analysis
PO Box 23660, Mail Station 6-C
Oakland, CA 94623-0660
Attn: Howell Chan

RE: Initial Study Jameson Canyon Widening & Hwy 12/29 Interchange Project

Dear Mr. Chan:

Thank you for giving me the opportunity to comment on the initial study document covering Jameson Canyon and the Hwy 12/29 interchange.

EX-1 Let me first begin my comments with the project description on page v. I challenge the statement in the first paragraph that "This project will reduce the existing traffic congestion by adding two more lanes, thus solving existing operational problems along the Jameson Canyon Road".

I see nothing in the proposal that will truly **solve** the existing operational problems as the project scope only extends to Red Top Road. In addition, there is no money, nor an anticipated timeline to improve the Hwy 12/29 intersection. Everyone who travels Jameson Canyon clearly knows that the true cause of the congestion is not the size of the roadway, but the entrances and exits at both ends.

EX-2 Widening Jameson without fixing the Hwy 80 or Hwy 29 merges is likely to cause more accidents in these locations. Widening Jameson will increase driver speeds. An additional lane will allow drivers to weave in and out of lanes as they pass slower cars or trucks - increasing the opportunity for accidents - accidents that won't always conveniently be situated to allow traffic to pass on the median or shoulder. And, should this occur, the concrete divider will prevent CHP from routing traffic onto the opposite roadbed. You may prevent head-on collisions (which incidentally have not occurred since the rumble strips have been installed), but not eliminate accidents or traffic blockages with your design.

EX-3 Both Hwy 12/29 intersection alternatives presented in this document will continue to create backups on Hwy 29 for traffic wishing to turn left into Jameson Canyon. There is also some confusion if Northbound Hwy 29 traffic will be required to stop before entering Jameson Canyon. If the goal is free flowing traffic into and out of Hwy 29, then we should be

considering other alternatives not referenced in the document under review.

EK4 (Page 1) The last paragraph incorrectly identifies Red Top Road as a signal-controlled intersection.

EK5 (Page 19) It is unclear why you would wish to design westbound and eastbound lanes to different standards. I am aware that the eastbound lanes will have wider shoulders and other amenities that meet current standards, while the westbound lanes will be the existing roadway. Therefore, the westbound lanes are not being designed, they are being reused. The comments in this section could also lead the reader to believe the speed limits will be 55 mph in one direction and 65 mph in the other. I suggest you clarify the wording in this section.

EK6 (Page 26) Transportation System Management and Transit. "Developing transit service between Napa & Fairfield is unlikely in the near term;" The ongoing discussions between NCTPA & its Solano County counterpart to implement a commute bus are not being recognized by the writers of this study. Transportation Demand (or System) Management such as removing unnecessary truck traffic during peak hours, adding carpools, vanpools, and shifting work schedules (where possible) will have a positive impact on Jameson Canyon congestion. Will it be enough to prevent this expensive expansion? Maybe not. But if we do not aggressively shift transit behavior now, an expanded Jameson Canyon will quickly return to existing levels of service. This study should support and encourage all TDM efforts even though "This alternative is unlikely to succeed in easing congestion on SR12 and therefore rejected as an alternative."

EK7 (Page 33-36) Impacts on Growth: According to Reid Ewing, Associate and Research Professor at the National Center for Smart Growth, University of Maryland, widening roadways provide short term benefit but are not particularly effective in the long term. In addition, widening roadways creates an affect he calls Induced Travel. In 1993 a University of California-Berkeley team led by Mark Hansen produced a study on the auto traffic effects of changes in road capacity that the EPA in 2000 was citing as an industry standard: "The peer-reviewed results are statistically robust and quite clear: induced travel can occur and can absorb all new capacity." In fact, the "full increase in VMT (vehicle miles traveled) materializes within five years of the change in road supply." Moreover, these additional lanes may very well produce even greater traffic congestion on other roads. The Berkeley studied found that "adding lane miles in a given county increases VMT throughout the wider region." And while it is unclear whether widening roadways is growth inducing, it is clear that building

new or expanded roadways does define where growth will occur. Nothing in this EIR discusses the impact of widening Jameson Canyon on nearby streets, roads, or highways - yet this information will be critical to Napa and Solano decision makers.

EK8

From a transportation, economic, and environmental standpoint, we should do everything we can to encourage and entice people to live closer to where they work. Yet, widening Jameson Canyon will have the opposite effect. Using the studies referenced above, it will be easier for Solano County residents to commute to Napa, thereby incenting more growth in Solano.

EK9

(Page 50) Visual/Aesthetics: Sadly, "Jameson Canyon is neither an eligible State Scenic Highway nor a County Scenic road." Yet for those who live in Napa County, Jameson Canyon is the first indicator that you are clearly entering a rural county when you turn off Hwy 80. And we would very much like to keep it looking like a rural road. Replanting trees along the corridor (to offset the loss of 549 trees removed) should be encouraged as well as adding native plants to soften the expanses of concrete. Landscaping is often cut as costs on roadway projects exceed original projections. Every measure should be taken to retain the landscaping plan with additional emphasis on native vegetation. Natural-looking elements should be chosen (such as the cut rock texture on retaining walls) to reduce the dominance of the roadway.

EK10

(Appendix A: CEQA Checklist) Section XII Population and Housing. I disagree with the determination that **No Impact** is the answer to a) Induce substantial population growth in an area either directly or indirectly is accurate. Refer to my comments on growth above. Widening Jameson Canyon can indirectly induce growth in Solano County and possibly American Canyon (where a large portion of the population commutes to jobs outside Napa County).

Thanks and regards,

Eve Kahn
3485 Twin Oaks Court
Napa, CA 94558



NAPA COUNTY BICYCLE COALITION

To Make Bicycling in Napa County Safe, Convenient, and Pleasant

1016 Fabiola Drive, Napa, CA 94558
707-224-6923
NBC@eaglecyclingclub.org

9-19-07

Ms. Kelly Herschberg

Project Manager
CALTRANS District 4

RE: Jameson Canyon Neg Dec

Dear Ms Herschberg,

The Napa County Bicycle Coalition (NCBC) is glad to see improvements being made to the Jameson Canyon corridor. However there is no public transportation on this route, leaving cycling and walking as the only practical alternatives to automobile usage. However due to the narrow shoulder widths, high speeds and poor site lines this important artery has been rarely used as a bicycle route. The current plan for the Jameson Canyon corridor, however, only encourages the already high speeds that currently discourage non-motorized transport.

Many of us in Napa would be potential users of this road if it can properly accommodate bicycles or pedestrians. The present document is incomplete and does not give a complete picture of the project, please consider these items in your EIR;

Inclusion of Napa and Solano Bike Plans, Bay Trail Plan

NCBC1 The Napa County Bike Plan is not mentioned in your document on p 32 (2.1.1) with the many other planning documents. The Solano County Bicycle Plan is also missing. Both of these plans call for a class one bicycle lane through this transportation corridor. The Bay Trail plan calls for connecting trails from Fairfield to the Bay Trail.

Unmet Demand for Commuters and Recreational Cyclists

NCBC2 This document needs projections quantifying the number of potential recreational and commuter bicycle users. The Draft Napa General Plan EIR describes a large unmet need for bicycle routes. A modest four percent of commuters are a significant number of bicycles through in Napa County. The cities of Napa and Yountville have a great deal of bicycle traffic between them and there is a much larger population between the cities of Napa, Vallejo and Fairfield. We suggest one per cent of commuter trips is possible with a class one in year 2015 and increasing to 10% over the life of the project. These numbers will be virtually impossible to reach with a class three route along a highway corridor with cars traveling at relatively high speeds. Class three paths on roads with 25 mph+ speed limits are too intimidating for most bicyclists to utilize.

Steering Committee Lou Penning, Chair; Sandy Houck, Vice Chair; Joel King, Secretary; Terry Tracy, Facilities Committee; Bob Hillhouse, Membership Committee

Inclusion of Safety Features for Non-Motorized Transportation

Section 2.1.6 calls for an accommodation of bicycles and pedestrians in the project. In the document, the road is described as having a wide shoulder. The drawings do not show the class one at or near Kelly Rd described in the text. It is not clear if this is this will be recognized as a class three.

Highway 29 / Devlin Rd. Bike Route

Highway 29 between Napa and Vallejo is primary bicycle route that is in the Napa County Bicycle Plan. The interchange alternatives do not offer a bicycle solution to the high speed merge lanes on Highway 29, compounding the already high speed mix on this road. The suggestion that bicycles or pedestrians will take the longer and incomplete Devlin Rd. and Kelly Rd. works against promoting cycling as an alternative to automobile traffic—and reducing congestion, pollution, and greenhouse gas emissions.

Ridge Trail Under Crossing

The time to build the under crossing for the ridge trail is during construction of the project. The cost estimates for this should be provided before it is terminated from consideration. To render this as a separate, retrofit project will be more costly in the end, thus wasting taxpayer's money.

Social Equity

This transportation corridor does not accommodate persons without a car or drivers license. There is no bus service leaving cycling or walking as a practical alternative to the car. A wide shoulder with high speed traffic is not the same degree of safety given to those in autos.

Safety Benefits

In the San Francisco Bay Area, pedestrians and bicyclists represent 23.4% of all traffic fatalities. The largest percentage of these fatalities occur in Caltrans' domain on highway facilities. Jameson Canyon is a prime opportunity for Caltrans to demonstrate a commitment to safety for non-motorized transportation.

Health Benefits

One in three Americans are obese. We have an epidemic of diabetes overtaking our youth in large part because of lack of physical activity. Health costs are soaring as a result. Studies have shown that communities that provide "active transportation" options such as class one bike paths have a more active population—and that the costs associated with such a project are offset greater by the savings in health care costs.

Economic Benefits

Commuters to the Napa Airport industrial area from Solano County will benefit from a viable alternative to the car. A class one lane supplies a far greater benefit than a wide shoulder. With variable energy supplies it is important to have multiple methods to get to work. Real estate industry reports have shown that regions with "active transportation" amenities raise housing values and better retain (and attract) employers and desirable employees alike.

Environmental Benefit

NCBC10
It is assumed that air quality will not be significantly impacted. However, the goal of the State of California is to reduce carbon emissions. Transportation is the State's leading generator of greenhouse gas emissions. A class one bike lane will offer a greater incentive and opportunity to commuters to get out of the car. Potential for carbon emission reduction should be estimated for a class one that generates a higher mode share than a class three.

Tie the Class One Path to the City of Fairfield

NCBC11
The bike path at the eastern terminus of the project does not appear to be part of the project or considered or addressed in the Neg Dec. This class one route has not been paved to connect to the Highway 12 roadway. To cross this gravel barrier cyclists walk their bikes to Highway 12. This is a further discouragement to non-motorized transportation and should be fixed as part of the project.

Conclusion

Caltrans can go beyond the minimum of accommodation of bicycles and pedestrians. The class one bike/ped path required by the Solano County General Plan, the Napa County Bicycle Plan, and the Bay Trail Plan needs to be built as part of this highway expansion project. The goals of the Regional Transportation Plan and our communities are better met by creating a class one bike lane and encouraging non-motorized transportation along this route. Specifically:

- Equity goals will be met by including those without automobiles.
- Health goals will be acknowledged by building opportunities for exercise.
- Safety needs would be addressed vs. being ignored.
- Environmental goals are better served by encouraging zero-emission transportation alternatives.
- Economic benefits will be provided by ensuring that Napa County builds in infrastructure that improves quality of life for families and individuals and that addresses the need to reduce congestion in the long-term..

The Jameson Canyon EIR fails to address the class one path called for in the Solano County Bicycle Plan, the Napa County Bicycle Plan and the Bay Trail Plan.

Please feel free to contact me with any questions.

Sincerely,

Louis M Penning
Napa County Resident
Chair, Napa Bicycle Coalition



Howell Chan
Office of Environmental Analysis
Caltrans, District 4
P.O. Box 23660, MS-8B
Oakland, CA 94623-0660

RE: State Routes 12 and 29 – "INITIAL STUDY with PROPOSED MITIGATED
NEGATIVE DECLARATION (CEQA) and ENVIRONMENTAL ASSESSMENT
(NEPA)" Dated August 1, 2007

Dear Mr. Chan,

Panattoni Investments, LLC is the owner of Assessor's Parcel Number 057-190-022 in Napa County (see attached assessors parcel map). The property is approximately 15.62 acres and is located at the northeast corner of the intersection of State Highways 12 and 29.

P1 The aerial photographs of this site in the referenced document show this site vacant. I have enclosed a copy of the site plan which includes 2 large warehouse buildings. Construction of Building A, on the attached site plan, was completed in August of 2006 and Building B is under construction and will be completed in December of this year.

P2 It appears that the "Rte 12/29 Interchange Project Single Point Alternative" would have little or no impact on our facilities and could be accomplished without taking land from our parcel.

I can have my architect provide you with a CAD version of this site plan if you need it.

Please make note as you continue to study the interchange improvements that our parcel has two buildings on it and will most likely be fully leased by June 2008. Should you need additional right of way keep in mind that the Fire Marshal will require us to maintain a 25 foot paved surface around the buildings.

If you have any questions or need additional information please call me at 916-379-1119. Please forward any further correspondence regarding this property to my attention at the address below.

Sincerely,

Jim Jeary
Senior Development Manager

Enclosures
c: Peter von Elten

57-19

Map A + B

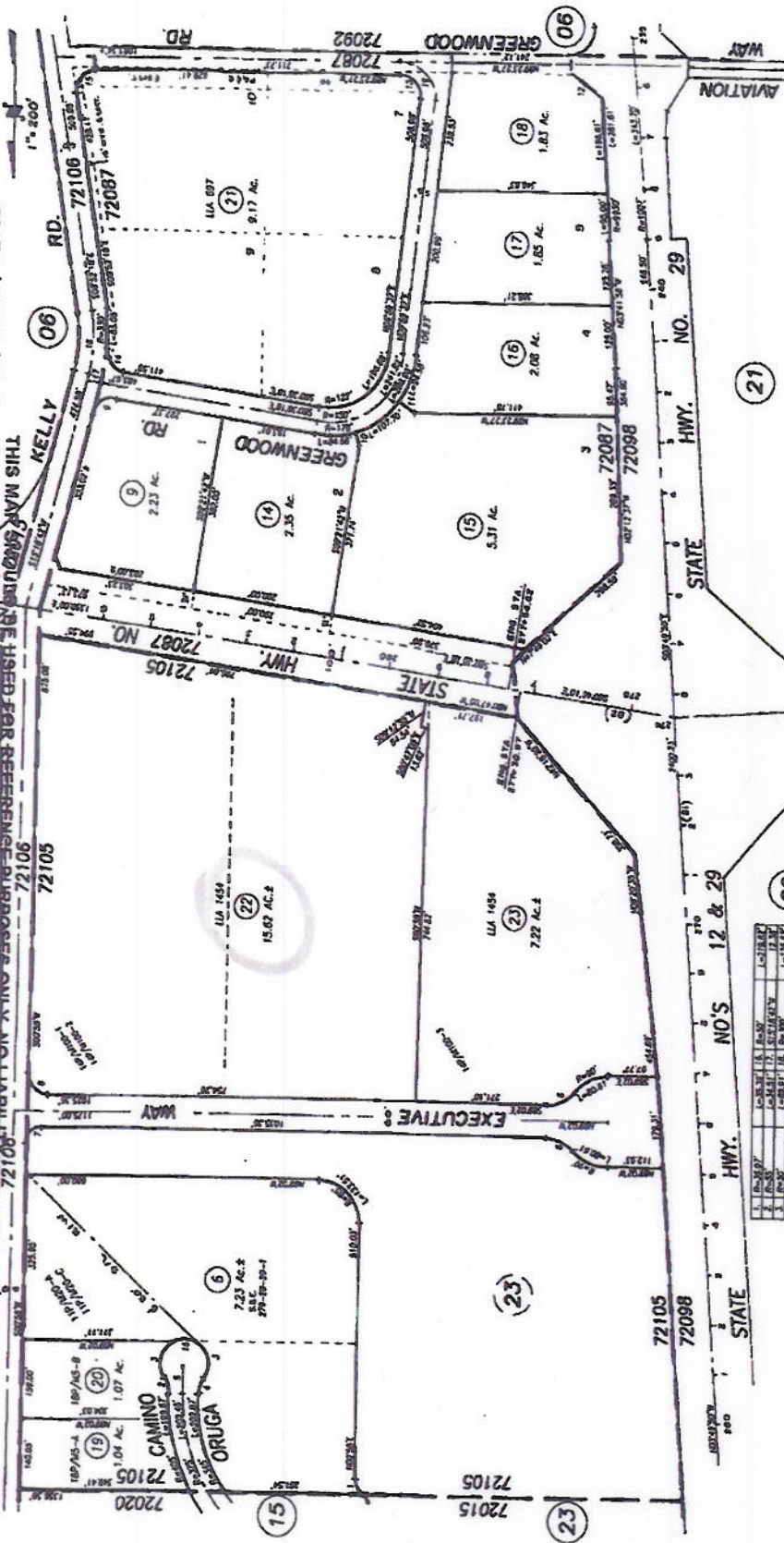
Tax Area Code
72105, 72087, 72106

THIS MAP WAS PREPARED FOR REFERENCE PURPOSES ONLY. IT IS ASSUMED THAT THE USER OF THIS MAP HAS OBTAINED THE NECESSARY PERMITS AND RIGHTS FROM THE APPROPRIATE AGENCIES.

COUNTY ASSESSOR'S PARCEL MAP

02

KELLY



| REVISION | DATE |
|-------------------------|------|
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| 6-11-12 | |
| 10-22 & 23 11A 17-15-03 | |

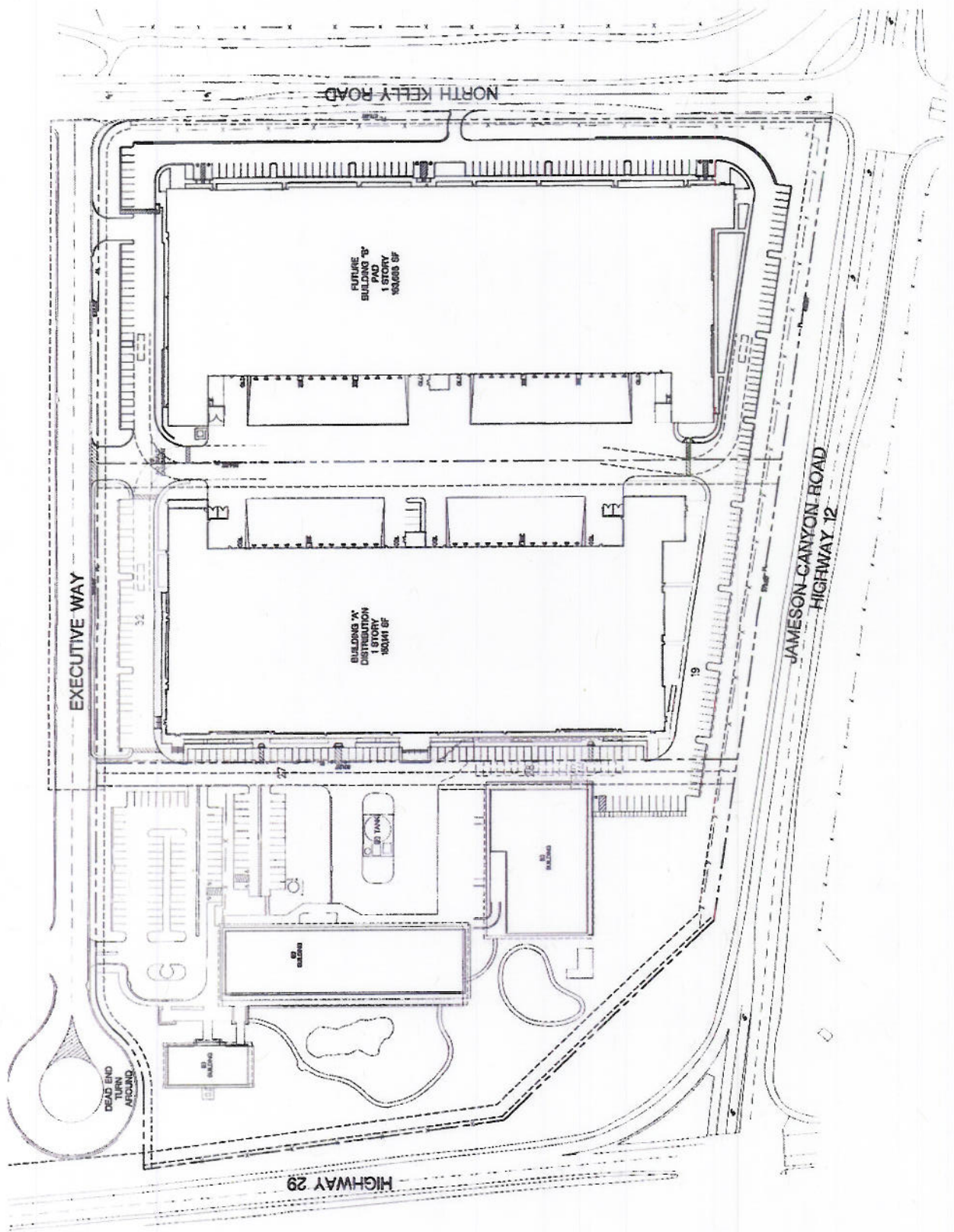
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NOTE: This Map Was Prepared For Assessment Purposes Only. No Liability Is Assumed For The Accuracy Of The Data Delineated Hereon.

Ptn. Thompsons Soccer Ranch Subd. R.M. Bl. 1, Pg. 56
Napa Valley Gateway Unit 1 R.M. Bl. 16, Pg. 91

57-19

AN # 057-190-022





September 25, 2007

Mr. Howell Chan, Senior Environmental Planner
Caltrans
P.O. Box 23660, Mail Station 6-C
Oakland, CA 94623-0660

Subject: State Route 12 Jameson Canyon Road Widening & State Route 29/12 Interchange Project

Dear Mr. Chan:

Thank you for the opportunity to comment on the above-referenced project. The Bay Trail Project is a nonprofit organization administered by the Association of Bay Area Governments (ABAG) that plans, promotes and advocates for the implementation of a continuous 500-mile bicycling and hiking path around San Francisco Bay. When complete, the trail will pass through 47 cities, all nine Bay Area counties, and cross seven toll bridges. To date, slightly more than half the length of the Bay Trail alignment has been developed.

The Bay Trail is defined by three types of trail—spine, spur, and connector trails. The spine is the continuous alignment around all nine counties, spurs provide point access to the waterfront, and connector trails provide access to the Bay Trail spine from outlying areas. Jameson Canyon Road/State Route 12 was adopted as an official proposed connector trail by the Bay Trail Steering Committee on February 1, 2005. Jameson Canyon Road provides a logical and much-needed connection between Solano and Napa Counties, and is identified in the Solano County Plan as a Class I facility, and in the Napa County General Plan as a Class II facility.

While it is unclear from the Initial Study/Proposed Mitigated Negative Declaration and Environmental Assessment ("the document") whether Caltrans intends to prepare an Environmental Impact Report/Statement (EIR/S) for this project, the current document does not provide adequate information in important areas, as described below.

Consistency with Plans

54BT 1
The document fails to reference the Solano Countywide Bicycle Plan which, as referenced above, calls for a Class I path on Jameson Canyon Road. The document also fails to reference the San Francisco Bay Trail Plan, adopted by the ABAG Executive Board in 1989. While the document references the Napa County General Plan and its call for a Class II bike lane, the document does not discuss how the proposed project will implement bicycle and pedestrian facilities. Please provide us with specific information regarding how these plans are being addressed by the proposed project.

Traffic/Transportation/Pedestrian and Bicycle Facilities

SPBT2
The document does not provide any meaningful description of the bicycle/pedestrian facilities proposed as part of the project though it was our understanding that a Class II signed, striped bike lane would be included in the project. While this would represent an improvement over the existing condition for cyclists, the Bay Trail Plan calls for a Class I facility on this roadway as we believe it is the only configuration that can safely provide non-motorized transportation in this corridor. As such, the Jameson Canyon Bay Trail Connector will remain a gap in our system until such time as the Class I pathway called for in the Bay Trail Plan and the Solano County Bicycle Plans is completed. Additionally, please provide specific information regarding the use of State Route 12/Jameson Canyon Road by pedestrians under the proposed project configuration.

Deputy Directive 64

SPBT3
Please provide information regarding how Caltrans plans to apply Deputy Directive 64—the policy requiring that bicycling and walking be considered in all aspects of Department operation and decision-making—to the Jameson Canyon widening project. Passing reference is made to this policy in the document, but no discussion regarding how the directive will be applied to this particular project is provided. It is important that all modes of travel be accommodated when new or expanded facilities are being proposed.

Bay Area Ridge Trail

SPBT4
The San Francisco Bay Trail and the Bay Area Ridge Trail have similar missions—to complete a 500-mile regional trail system. The Bay Trail and the Ridge Trail collaborate to ensure connections between the two systems are made wherever possible. An undercrossing of Jameson Canyon Road will be needed by the Ridge Trail in order to connect their north/south alignment in this area, and to connect users to Newell Open Space Preserve. Construction of such an undercrossing should be incorporated into this project as it is a relatively minor piece of the overall infrastructure. To require that the undercrossing be planned, permitted, and reviewed as a separate project would represent a lost opportunity to streamline two important projects.

If you have any questions about the Bay Trail Plan or our alignment in Napa and Solano Counties, please do not hesitate to contact me at (510) 464-7909, or by e-mail at maureeng@abag.ca.gov.

Sincerely,



Maureen Gaffney
Bay Trail Planner

cc: Robert Macaulay, STA
Robert Guerrero, STA
Dee Swanhuysen, Bay Area Ridge Trail



SIERRA
CLUB
FOUNDED 1892

NAPA GROUP

P.O. Box 644
Napa, CA 94559
www.redwood.sierraclub.org/napa

September 25, 2007

Caltrans
Attn: Howell Chan
Office of Environmental Analysis
P.O. Box 23660, Mail Station 6-C,
Oakland, CA 94623-0660

Howell.Chan@dot.ca.gov

Dear Mr. Chan:

We are writing in response to the opportunity to submit public comment on the *State Route 12 Jamieson Canyon Road Widening & State Routes 29/12 Interchange Project, Initial Study with Proposed Negative Declaration (CEQA) and Environmental Assessment (NEPA)* (hereinafter "IS").

SL1
Summary: the IS does not adequately assess or attempt to mitigate the increase in greenhouse gases that will result from this project. The cumulative impact in this regard is significant. A mitigated negative declaration is inappropriate and both an Environmental Impact Statement and an Environmental Impact Report under CEQA and NEPA respectively, are necessary.

SL2
The threat of global warming and the rapid approach of the point of no return with respect to climate change mandates that no transportation project be approved unless it is neutral in impact, serves to decrease the contribution to climate change, or is truly unavoidable and the least impactful alternative is adopted. This project will increase greenhouse gases. Inadequate consideration has been made to determine if the project can be avoided or an alternative with less impact adopted.

Chapter 2.5 of the report addresses climate change concerns, including Executive Order S-3-05 signed in 2005 by Governor Schwarzenegger, and AB 32 passed by the legislature in 2006. These acts call for substantial on-going reduction of greenhouse gas (GHG) emissions in California.

As the report goes on to remind us, approximately 40 % of our GHG emissions are produced by transportation. Consequently, the mandated reductions in GHG's can only be achieved by cutting production in the transportation sector. Strategies must be varied, and include improving efficiency of automobiles (miles per gallon of gas), reducing the number of miles traveled in private automobiles, particularly single occupancy vehicles, and switching to more efficient mass-transit modalities.

SC3

By widening Jamieson Canyon, Caltrans is in fact encouraging and exacerbating the increase in private vehicular traffic and therefore GHG. The report seeks absolution for Caltrans from the responsibility for GHG increases which will inevitably be generated in Jamieson Canyon by noting that no one project significantly increases GHG emissions, and that Caltrans does not have authority over land-use planning decisions which would increase transportation efficiency. But this is a circular argument. If each business, household, and government agency argues that the problem is owned by someone else, progress can never occur.

Given the potential for reaching the point of no return on climate change added to the fact that transportation represents 40% of GHG, the only logical conclusion is that any project that increases rather than decreases the use of private automobiles has a significant cumulative impact on global warming. The lack of formal methodology or generally accepted impact analysis is not necessary where simple logic will do. Consequently, a mitigated negative declaration is not warranted for this project, particularly as no mitigation of this factor is proposed other than unsupported claims of action generally taken by the Dept. of Transportation unrelated to this particular project.

SC4

The appropriate approach is to require that all transportation projects refrain from adding to GHG rather than to conclude that no one project makes a significant contribution and thus, no single project needs to take the impact on GHG into account. Caltrans must seize the initiative and work with local governments to address automobile congestion by sustainable measures, rather than continuing short-sighted and non-sustainable support for single occupancy vehicle use by widening highways. Those measures should include improving the scanty mass transit connectivity between Napa and Solano counties, developing more affordably-priced housing in Napa, encouraging employer participation in commuting solutions, and other means that may entail thinking outside the box.

SC5

With the above as background, a review of the alternatives proposed clearly indicates that inadequate consideration was given to whether transportation system management (TSM) alone would be an adequate alternative. Consideration was not given to prohibiting the use of the route by commercial trucks during rush hour, use of more flex-time by Napa employers, commuter buses operated by major employers, ways to move vehicles off the roadway in case of car trouble or accidents, and other possibilities. Nor was adequate consideration given to the development of transit services between Fairfield and Napa, which the report merely concludes is unlikely by mentioning that it would require capital and other expenditures without indicating the level of costs that would be incurred or comparing those to the cost of widening the highway.

In fact, this project will actually decrease the potential for and effectiveness of TSM. By increasing capacity for inter-county commuting by private automobile, the Jamieson Canyon widening project will decrease the feasibility of developing Napa-Solano mass-transit interfaces, will decrease the imperative for building affordable housing in Napa County, and will promote increased use of gasoline and production of greenhouse gas emissions.

SC6

What's more, consideration needs to be given to an alternative that would allow a lesser degree of widening combined with improved TSM – i.e., developing a single additional lane which would accommodate high occupancy vehicles (HOV) toward Napa in the morning and out of Napa in the evening, along with an aggressive campaign geared toward commuters and employers to increase HOV use.

SC7

Additional analysis should also determine the positive impact of improving the interchanges at Highways 29 and 80 without widening the Jamieson Canyon corridor. It has been widely known that congestion on the project highway is caused to a large degree by the inadequacy of the interchange on I-80. Analysis on this point may indicate that improvements on these intersections would lessen the need for this project. At a minimum, analysis should be included

that would determine if the widening of Jamieson Canyon would be futile without improvements to the intersections. A worst case scenario would be that widening Jamieson Canyon would result in more traffic idling if the I-80 intersection cannot deal with the increased number of vehicles.

SL8 The report treats the projected increase in Average Daily Traffic (ADT) volume from 34,500 vehicles in 2005 to 62,200 in 2035 as inevitable and inelastic. Yet traffic volumes are dependent on such factors as commerce, job/housing balance, and reasonable alternatives to the private automobile. Having concluded that TSM is inadequate alone, the project fails to include any incentives for ride-sharing or public transit use: no Park and Ride facilities, no carpool lanes, and no plans to connect the Napa Vine service with Solano public transit facilities.

It is well known that widening highways does not in fact relieve congestion except for a brief period of time. Rather it increases traffic and allows a greater number of highway users to experience the congestion that soon follows the increased capacity, leaving the surrounding area to deal with a greater number of vehicles on local roads. At a minimum, TSM needs to be included to lengthen the time that the project would be effective.

SL9 The conclusion that the project will not affect "neighborhoods, social, cultural or educational facilities or the economy of the area" and that the project "will not change the rate of use of any natural resources" is unsupported and incorrect. Napa will experience increased traffic if Jamieson Canyon is widened. This will be growth-inducing and add to the population pressure.

SL10 We note that the draft Napa County General Plan, as noted in the IS, only includes widening Jamieson Canyon if it enjoys political support. The recent rejection of a funding proposal to widen Jamieson Canyon indicates that the project is not in fact supported by the residents of Napa County. Given that rejection, this project cannot be considered to be consistent with the current draft of the Napa County General Plan.

SL11 Setting aside the failure to establish that this project cannot be avoided or a less impactful one adopted, we note that the project does not adequately include accommodation for non-motorized users of the Jamieson Canyon corridor. This is an important corridor for local portions of the Bay Area Ridge Trail (Napa-Solano segments) and the Bay Trail, as well as being a critical area for links between local regional parks such as Lynch, Newell and Skyline Park. A class III bike trail would be inadequate and unsafe. Class I is needed not only for safety reasons but to accommodate the local segments of the regional trails noted above. Accommodation for non-motorized users needs to include a mid-point under-crossing as part of this project. It is unconscionable to expend millions of dollars on facilitating single occupancy vehicle use while failing to include in the project safe, adequate accommodations for non-motorized users consistent with existing trail projects that have been approved by county officials and included in regional transportation plans.

A fuller analysis of TSM, along with consideration of an alternative including both TSM and the development of a single additional lane should be included, as well as analysis of the impact of improving the I-80 intersection and the negative impact of widening this highway without improving that intersection.

In the face of uncontroverted evidence that private cars represent a substantial source of GHG, and the logical conclusion that a project which encourages further automobile use will necessarily have a significant cumulative impact on GHG, a mitigated negative declaration is inappropriate. Both an Environmental Impact Statement and an Environmental Impact Report under CEQA and NEPA respectively, are necessary.

Thank you for this opportunity to submit comments,

A handwritten signature in black ink, appearing to read 'Elisabeth Frater', written in a cursive style.

Elisabeth Frater, Chair
Napa Group, Redwood Chapter, Sierra Club

cc: Elliot Hurwitz (ehurwitz@nctpa.net)

**DEPARTMENT OF CONSERVATION****DIRECTOR'S OFFICE**

801 K STREET • MS 24-01 • SACRAMENTO, CALIFORNIA 95814

PHONE 916 / 322-1080 • FAX 916 / 445-0732 • TDD 916 / 324-2555 • WEB SITE conservation.ca.gov**TO:**Project Coordinator
Resources AgencyHowell Chan, Senior Environmental Planner
Caltrans
Office of Environmental Analysis
P.O. Box 23660
Oakland, CA 94623-0660**FROM:**Brian Leahy, Assistant Director
Department of Conservation
Division of Land Resource Protection**DATE:**

September 27, 2007

Subject:INITIAL STUDY – PROPOSED MITIGATED NEGATIVE
DECLARATION/ENVIRONMENTAL ASSESSMENT (IS-PMND/EA)
STATE ROUTE 12 JAMESON CANYON ROAD WIDENING AND STATE
ROUTES 29/12 INTERCHANGE PROJECT SCH# 2007082158

The Department of Conservation's Division of Land Resource Protection (Division) monitors farmland conversion on a statewide basis and administers the California Land Conservation (Williamson) Act and other agricultural land conservation programs. The Division has reviewed the above IS-PMND/EA addressing widening of State Route 12 from two to four lanes, installation of a median barrier, and conversion of the State Route 29/12 intersection into an interchange. The Division has the following comments on the IS-PMND/EA.

The road widening project will involve acquisition of land from private landowners for purposes of right-of-way along SR 12. A total of 34 parcels used for vineyard or rangeland purposes will be impacted by the project, however, the amount of land acquired will be only 67.95 acres. There is no mitigation proposed for this agricultural land conversion. The Division recommends that mitigation be considered for any prime farmland, farmland of statewide importance or unique farmland impacted by the project. Although the acreage converted in this project is relatively small, the cumulative impacts of similar projects may be significant. Caltrans has considered the purchase of agricultural conservation easements as a form of mitigation for agricultural land conversion resulting from other projects, therefore, should consider its feasibility for this project.

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SEP. 27 2007

STATE CLEARING HOUSE

Howell Chan, Senior Environmental Planner
September 27, 2007
Page 2 of 2

Information about conservation easements is available on the Division's website at <http://www.conservation.ca.gov/DLRP/>, or by contacting the Division at the address and phone number listed below.

CRL2 The IS-PMND/EA also notes that six of the agricultural parcels are under Williamson Act contract, however, acquisitions will have minimum impact since the acreage per parcel is relatively small, e.g., 6.18 acre-maximum, and the acquisition areas will be on the periphery of the parcels. Acreages of these contracted parcels and contract numbers are noted in Table 2.1.3.3 in the document, however, the "Take ac." column data does not correspond with the descriptive paragraphs below the table. If the "Take ac." column denotes the acres to be acquired for the project, the largest acquisition would be 13.24 acres instead of the 6.18 acres referenced in the narrative. The Division recommends clarifying the actual amount of acquisitions from contracted parcels.

CPL3 In addition, public acquisitions of lands under Williamson Act contract for public purposes require notice to the Department of Conservation and specified findings (Government Code Sections 51291-51292). The Division recommends that the notice process be initiated as early as possible in the planning stages of the project. A summary of the required notice provisions and findings is attached.

Thank you for the opportunity to comment on the IS-PMND/EA. If you have questions on our comments, or require technical assistance or information on agricultural land conservation, please contact the Division at 801 K Street, MS 18-01 Sacramento, California 95814; or, phone (916) 324-0850.

Attachment

cc: Napa County RCD
1303 Jefferson Street, #500 B
Napa, CA 94559

ACQUISITION NOTIFICATION PROVISIONS OF THE WILLIAMSON ACT

Notification provisions of the Williamson Act (Government Code Section 51291) require an agency to notify the Director of the Department of Conservation of the possible acquisition of Williamson Act contracted land for a public improvement. Such notification must occur when it appears that land enrolled in a Williamson Act contract may be required for a public use, is acquired, the original public improvement for the acquisition is changed, or the land acquired is not used for the public improvement. The local governing body responsible for the administration of the agricultural preserve must also be notified.

NOTIFICATION (Government Code Section 51291 (b))

The following information must be included in the notification correspondence.

1. The total number of acres of Williamson Act contracted land to be acquired and whether the land is considered prime agricultural land according to Government Code Section 51201.
2. The purpose for the acquisition and why the land was identified for acquisition. (If available, include documentation of eminent domain proceedings or a property appraisal and written offer in lieu of eminent domain per GC §§7267.1 and 7267.2 to void the contract per GC §51295; include a chronology of steps taken or planned to effect acquisition by eminent domain or in lieu of eminent domain.)
3. A description of where the parcel(s) is located.
4. Characteristics of adjacent land (urban development, Williamson Act, noncontract agricultural, etc.)
5. A vicinity map and a location map (may be the same as #8).
6. A copy of the contract(s) covering the land.
7. CEQA documents for the project.
8. The findings required under GC §51292, documentation to support the findings and an explanation of the preliminary consideration of §51292. (Include a map of the proposed site and an area of surrounding land identified by characteristics and large enough to help clarify that no other, noncontract land is reasonably feasible for the public improvement.)

ACQUISITION (Government Code Section 51291 (c))

The following information must be included in the notification when land within an agricultural preserve has been acquired. The notice must be forwarded to the Director within 10 working days of the acquisition of the land. The notice must also include the following:

1. A general explanation of the decision to acquire the land, and why noncontracted land is not available for the public improvement.
2. Findings made pursuant to Government Code Section 51292, as amended.
3. If the information is different from that provided in the previous notice sent upon consideration of the land, a general description of the land, and a copy of the contract covering the land shall be included in the notice.

SIGNIFICANT CHANGE IN PUBLIC IMPROVEMENT (Government Code Section 51291 (d))

Once notice is given as required, if the public agency proposed any significant change in the public improvement, the Director must be notified of the changes before the project is completed.

LAND ACQUIRED IS NOT USED FOR PUBLIC IMPROVEMENT (Government Code Section 51295)

If the acquiring public agency does not use the land for the stated public improvement and plans to return it to private ownership, before returning the land to private ownership the Director must be notified of the action. Additional requirements apply.

DIRECTOR, DEPARTMENT OF CONSERVATION MAILING ADDRESS

Bridgett Luther, Director
Department of Conservation c/o Division of Land Resource Protection
801 K Street, MS 18-01, Sacramento, CA 95814.

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS – M.S.#40

1120 N STREET

P. O. BOX 942873

SACRAMENTO, CA 94273-0001

PHONE (916) 654-4959

FAX (916) 653-9531

TTY 711

*Flex your power!
Be energy efficient!*

September 20, 2007

Mr. Howell Chan
California Department of Transportation
111 Grand Avenue
Oakland, CA 94623

Dear Mr. Chan:

Negative Declaration for State Route 12 Jameson Canyon Road Widening & State Routes 29/12 Interchange Project; SCH# 2007082158

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues pursuant to the California Environmental Quality Act (CEQA). The Division has technical expertise in the areas of airport operations safety, noise and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports.

DTA1
The proposal is to widen the two-lane conventional highway State Route 12 (Jameson Canyon) to a four-lane conventional highway and improve the intersection of State Routes 29 and 12 to an interchange. The interchange part of the project is located approximately 5,700 feet east of the Napa County Airport and will have an impact on Airport Boulevard which is the main entrance serving the Napa County Airport. Two alternatives are proposed for the interchange, a single-point interchange and a tight diamond interchange. The Division of Aeronautics would suggest using the alternative which is most favorable with providing access and egress from the Napa County Airport. We would also ask that any new signs provide information about the location of the Napa County Airport.

DTA2
In accordance with CEQA, Public Resources Code Section 21096, the Caltrans Airport Land Use Planning Handbook (Handbook) must be utilized as a resource in the preparation of environmental documents for projects within an airport land use compatibility plan boundaries or if such a plan has not been adopted, within two miles of an airport. The Handbook is a resource that should be applied to all public use airports. The Handbook is published on-line at <http://www.dot.ca.gov/hq/planning/aeronaut/humfile/landuse.php>.

DTA3
Public Utilities Code Section 21659 prohibits structural hazards near airports. In accordance with Federal Aviation Regulation, Part 77 "Objects Affecting Navigable Airspace" a Notice of Proposed Construction or Alteration (Form 7460-1) may be required by the Federal Aviation Administration (FAA). Form 7460-1 is available on-line at <https://oeaaa.faa.gov/oeaaa/external/portal.jsp> and should be submitted electronically to the FAA.

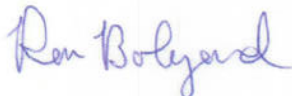
DTA 4
The proposal should be submitted to the Napa County Airport Land Use Commission for review. The proposal should also be coordinated with Napa County Airport staff to ensure that the proposal will be compatible with future as well as existing airport operations.

Aviation plays a significant role in California's transportation system. This role includes the movement of people and goods within and beyond our State's network of over 250 airports. Aviation contributes nearly 9 percent of both total State employment (1.7 million jobs) and total State output (\$110.7 billion) annually. These benefits are discussed in the study "Aviation in California: Benefits to Our Economy and Way of Life" available on-line at <http://www.dot.ca.gov/hq/planning/aeronaut/>. Aviation improves mobility, generates tax revenue, saves lives through emergency response, medical and fire fighting services, annually transports air cargo valued at over \$170 billion and generates over \$14 billion in tourist dollars, which in turn improves our economy and quality of life.

The protection of airports from incompatible land use encroachment is vital to California's economic future. Napa County Airport is an economic asset that should be protected through effective airport land use compatibility planning and awareness. Although the need for compatible and safe land uses near airports in California is both a local and a State issue, airport staff, airport land use commissions and airport land use compatibility plans are key to protecting an airport and the people residing and working in the vicinity of an airport. Consideration given to the issue of compatible land uses in the vicinity of an airport should help to relieve future conflicts between airports and their neighbors.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-7075.

Sincerely,



RON BOLYARD
Aviation Environmental Planner

c: State Clearinghouse, Napa County ALUC, Napa County Airport



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

September 28, 2007

Howell Chan
California Department of Transportation, District 4
111 Grand Avenue
Oakland, CA 94623

Subject: State Route 12 Jameson Canyon Road Widening & State Routes 29/12 Interchange Project
SCH#: 2007082158

Dear Howell Chan:

The State Clearinghouse submitted the above named Negative Declaration to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 27, 2007, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

SC#1
These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures

cc: Resources Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007082158
Project Title State Route 12 Jameson Canyon Road Widening & State Routes 29/12 Interchange Project
Lead Agency Caltrans #4

Type Neg Negative Declaration
Description The California Department of Transportation (Caltrans) proposes to widen the two lane conventional highway State Route 12 (Jameson Canyon) to a four lane conventional highway and improve the intersection to State Routes 29 and 12 to an interchange. The project involves both Napa and Solano County. The project will reduce the existing congestion by adding two lanes and solve the operational problem along the Jameson Canyon Road. The project has two viable build alternatives. A no-build alternative is also considered for the proposed project.

Lead Agency Contact

Name Howell Chan
Agency California Department of Transportation, District 4
Phone (510) 286-5623 **Fax**
email
Address 111 Grand Avenue
City Oakland **State** CA **Zip** 94623

Project Location

County Napa, Solano
City Napa, Fairfield
Region
Cross Streets Interstate 80
Parcel No.
Township

Range

Section

Base

Proximity to:

Highways I-80, SR-29
Airports Napa Airport
Railways
Waterways Jameson Canyon
Schools
Land Use Mostly Agricultural

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Caltrans, Division of Aeronautics; Air Resources Board, Transportation Projects; San Francisco Bay Conservation and Development Commission; California Highway Patrol; Department of Conservation; Department of Water Resources; Department of Fish and Game, Region 3; Cal Fire; Integrated Waste Management Board; Native American Heritage Commission; Department of Parks and Recreation; Public Utilities Commission; Reclamation Board; Resources Agency; State Water Resources Control Board, Division of Water Quality

Date Received 08/29/2007 **Start of Review** 08/29/2007 **End of Review** 09/27/2007

Note: Blanks in data fields result from insufficient information provided by lead agency.

